

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SPACE DATA CORPORATION,)
Plaintiff,)
vs.) Case No.:
ALPHABET INC., and GOOGLE) 5:16-cv-03260-BLF
LLC,)
Defendants.)
-----)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF
GERALD MARK KNOBLACH
San Francisco, California
Tuesday, July 17, 2018
Volume 4

Reported by:
RACHEL FERRIER, CSR No. 6948
Job No. 2966007

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1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] 09:53:04
8 Q And when were those discussions? 09:53:07
9 A I was going to say, like, two World Cups ago, so 09:53:08
10 how often is the World Cup. 09:53:19
11 Q Every four years? 09:53:21
12 A So, like, eight years ago, so 2010, I guess, 09:53:22
13 because I remember watching the World Cup with them. 09:53:25
14 Q Okay. And was those discussions geared towards 09:53:27
15 providing a consumer wireless services as opposed to 09:53:34
16 machine-to-machine or, you know, some other -- I'm 09:53:38
17 trying to sense if you were trying to get a deal through 09:53:43
18 those discussions to provide enduser services to average 09:53:46
19 consumers in partnership with a tel- -- telco? 09:53:51
20 A I mean, that was certainly the end goal. 09:53:53
21 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 09:54:00
23 he had been advocating that the public safety in Europe 09:54:05
24 move toward, instead of specialized police radios, 09:54:09
25 standard smartphones because they were -- you know, 09:54:13

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1 provided, typically, more functionality and were less 09:54:16
2 costly than specialized public safety radios, and I 09:54:19
3 recall there was some deployment they were working on in 09:54:22
4 the Canary Islands, I believe, which is, you know, 09:54:25
5 off -- technically part of the African continent but 09:54:27
6 owned and operated -- or, I guess, you know, part of the 09:54:30
7 Spanish general sovereignty. 09:54:33

8 Q And was that going to be a public safety 09:54:38
9 application? 09:54:41

10 A So it would be a public safety application, but, 09:54:41
11 of course, it's, like, Space Data is always trying to 09:54:43
12 do. We are trying to crawl, walk, and run, and so we -- 09:54:46
13 we see, at the end, that if we can service the Canary 09:54:48
14 Islands with, you know, LTE, or something like that, for 09:54:52
15 the public safety people -- they are kind of the -- the 09:54:55
16 less-price sensitive end of the market -- we can scale 09:54:57
17 the system then and start talking to individual 09:55:01
18 customers, because it's all, effectively, the same 09:55:05
19 technology and the same infrastructure. 09:55:07

20 Q When did those discussions with the individual at 09:55:09
21 [REDACTED] 09:55:12

22 A We were working through a kind of marketing 09:55:15

23 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] 09:55:33

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before
4 me at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were placed under oath; that a verbatim
7 record of the proceedings was made by me using machine
8 shorthand which was thereafter transcribed under my
9 direction; further, that the foregoing is an accurate
10 transcription thereof.

11 I further certify that I am neither financially
12 interested in the action nor a relative or employee of
13 any attorney or any of the parties.

14 IN WITNESS WHEREOF, I have this date subscribed
15 my name.

16 Dated: July 24, 2018

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21 RACHEL FERRIER

22 CSR No. 6948
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